

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

5/12/11 11:02

CIVIL ACTION FILE

NO. 4:04-CV-60-3

LISA ANGEL; BETTY BATES; THEOLA  
BATTLE; AGNES BOYD; MICHAEL  
BROWN; ANQUINETTE CARTER;  
JANELL CHISM; BERNICE HAWK  
COBB; MARY JO DIANA; BONNIE  
EIDSON; BETTY ELLINGER; JESSICA  
HARROD; ALLYSON JOHNSON; JONI  
LOVELACE; COLIN LUKE; ANGELA  
LUKE; CATHERINE MATARO; JOYCE  
PETTIT; LUANN PIERCE; BRENDA  
ROSSE; SUSAN SPOOR; MONIQUE  
ST. JULIEN; DEBORAH TERRELL;  
RAMONA WALKER; NAOMI WALKER;  
BRENDA WHITE; and MARTHA  
WIGGINS,

Plaintiffs,

v.

WYETH, INC. f/k/a AMERICAN HOME  
PRODUCTS CORPORATION; WYETH  
PHARMACEUTICALS, INC. f/k/a WYETH-  
AYERST PHARMACEUTICALS, INC., a  
Division of American Home Products  
Corporation; ROSEMARY STEWART, a  
citizen of the State of Georgia; ROBERT  
HAINES, a citizen of the State of Georgia;  
MARSHA FULLER, a citizen of the State of  
Georgia; JENNIFER WIGGS, a citizen of the  
State of Georgia; SHANNON BUGGS, a  
citizen of the State of Georgia; DOUGLASS  
W. RAY, a citizen of the State of Georgia;  
FRANK D. HAWKINS, a citizen of the State

**of Georgia; DAVID LEE DOWNING, a citizen of the State of Georgia; TERRI S. MORTON, a citizen of the State of Georgia; LISA CHURCH-RODENHISHER, a citizen of the State of Georgia; TRACI E. MULLIS, a citizen of the State of Georgia; JANET P. JACKSON, a citizen of the State of Georgia; AVERY T. LANIUS, a citizen of the State of Georgia; DAVID E. WILKES, a citizen of the State of Georgia; WOODFORD W. MOSS, a citizen of the State of Georgia; MICHAEL E. WINTERS, a citizen of the State of Georgia; ROBIN W. JONES, a citizen of the State of Georgia; and JOHN DOE NOS. 1-5,**

**Defendants.**

**JOINT MOTION TO STAY RULE 16 AND 26 OBLIGATIONS**

Plaintiffs Lisa Angel, Betty Bates, Theola Battle, Agnes Boyd, Michael Brown, Anquinette Carter, Janell Chism, Bernice Hawk Cobb, Mary Jo Diana, Bonnie Eidson, Betty Ellinger, Jessica Harrod, Allyson Johnson, Joni Lovelace, Colin Luke, Angela Luke, Catherine Mataro, Joyce Pettit, Luann Pierce, Brenda Rosse, Susan Spoor, Monique St. Julien, Deborah Terrell, Ramona Walker, Naomi Walker, Brenda White and Martha Wiggins (collectively, "Plaintiffs"), and Defendants Wyeth f/k/a American Home Products Corporation, Wyeth Pharmaceuticals, Inc. f/k/a Wyeth-Ayerst Pharmaceuticals, Inc., a Division of American Home Products Corporation, Rosemary Stewart, Robert Haines, Marsha

Fuller, Shannon Buggs, Douglass W. Ray, Frank D. Hawkins, Terri S. Morton, Lisa Church-Rodenhisher, Traci E. Mullis, Janet P. Jackson, Avery T. Lanius, David E. Wilkes, Woodford W. Moss, Michael E. Winters, David Downing, and Robin W. Jones (collectively, "Defendants") respectfully submit this motion to stay the filing requirements of the Federal Rules of Civil Procedure and the Local Rules of this Court.

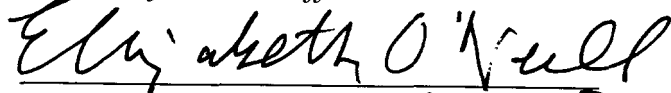
In support of this motion, the parties rely upon their memorandum of law in support hereof and all matters of record. The parties also attach hereto, for the Court's convenience, a proposed order granting this motion.

Respectfully submitted this 9<sup>th</sup> day of August, 2004.



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*Counsel for David Downing*



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American Home Products  
Corporation, Rosemary Stewart,  
Robert Haines, Marsha Fuller,  
Shannon Buggs, Douglass W. Ray,  
Frank D. Hawkins, Terri S. Morton,  
Lisa Church-Rodenhisher, Traci E.  
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Lanius, David E. Wilkes, Woodford  
W. Moss, Michael E. Winters and  
Robin W. Jones*

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FRANK D. HAWKINS, a citizen of the State**

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**NO. 4:04-CV-60-3**

of Georgia; **DAVID LEE DOWNING**, a citizen of the State of Georgia; **TERRI S. MORTON**, a citizen of the State of Georgia; **LISA CHURCH-RODENHISHER**, a citizen of the State of Georgia; **TRACI E. MULLIS**, a citizen of the State of Georgia; **JANET P. JACKSON**, a citizen of the State of Georgia; **AVERY T. LANIUS**, a citizen of the State of Georgia; **DAVID E. WILKES**, a citizen of the State of Georgia; **WOODFORD W. MOSS**, a citizen of the State of Georgia; **MICHAEL E. WINTERS**, a citizen of the State of Georgia; **ROBIN W. JONES**, a citizen of the State of Georgia; and **JOHN DOE NOS. 1-5**,

**Defendants.**

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### **CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the within and foregoing **Joint Motion To Stay Rule 16 and 26 Obligations** by U.S. Mail properly addressed upon the following defendants and counsel of record:

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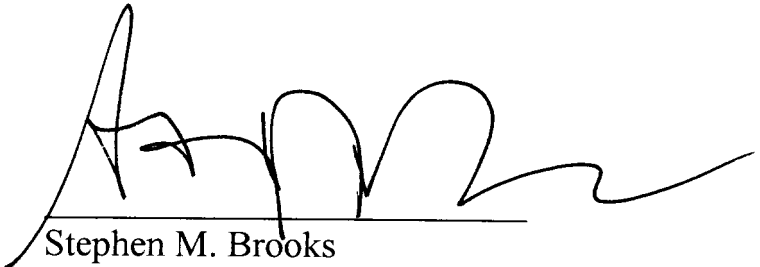
*Attorneys for Plaintiffs*

This 9<sup>th</sup> day of August, 2004.

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